

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LOUIS F. MATHESON JR., Derivatively on
Behalf of Nominal Defendant, IBIS
TECHNOLOGY CORP.

Plaintiff,

v.

MARTIN J. REID, DIMITRI A. ANTONIADIS,
ROBERT L. GABLE, LESLIE B. LEWIS,
DONALD McGUINNESS, LAMBERTO
RAFFAELLI, and COSMO TRAPANI,

Defendants

and

IBIS TECHNOLOGY CORP.,

Nominal Defendant.

Civil Action No. 04-10341 (RCL)

UNOPPOSED MOTION TO ADMINISTRATIVELY CONSOLIDATE ACTIONS

Plaintiff Louis F. Matheson, Jr. ("Plaintiff") hereby files this Unopposed Motion to Administratively Consolidate Actions. In support of this motion, Plaintiff states as follows:

1. This is a derivative action ("the Derivative Action") brought by a shareholder of Ibis Technology Corp. ("Ibis") against Ibis's CEO Martin J. Reid and its outside directors.
2. The factual allegations in this Derivative Action are similar to those set forth in five securities class actions pending before the Court, captioned: Martin Smolowitz v. Ibis Technology Corp. et al., Civ. No. 03-12613 (RCL) (filed on or about December 29, 2003); Fred Den v. Ibis Technology Corp. et al., Civ. No. 04-10060 (RCL) (filed on or about January 9, 2004); Jeffrey Weinstein v. Ibis Technology Corp. et al., Civ. No. 04-10088 (RCL) (filed on or

about January 14, 2004); George Harrison v. Ibis Technology Corp. et al., Civ. No. 04-10286 (RCL) (filed on or about February 11, 2004); and Eleanor Pitzer v. Ibis Technology Corp. et al., Civ. No. 04-10446 (RCL) (filed on or about March 4, 2004) (the "Class Actions"). While the Class Actions claim that the alleged facts constitute violations of the federal securities laws, the Derivative Action claims that these same alleged facts amount to breaches of the defendants' fiduciary duties to Ibis. The defendants have informed Plaintiff that they dispute the allegations.

3. On March 5, 2004, a motion to consolidate the Class Actions was filed. That motion is pending.

4. The parties hereto believe it makes good sense to administratively consolidate the Class Actions with the above styled derivative action and any subsequently filed derivative actions raising issues against any or all of the Defendants that are the same or similar to those raised in the present action.

5. Accordingly, the Plaintiff moves for the entry of an order establishing the following:

a. All subsequently filed actions by any shareholder asserting derivative claims on behalf of Ibis and raising issues against any or all of the Defendants that are the same or similar to those raised in the present action shall be consolidated with the present action.

b. Every pleading or paper filed in the consolidated action concerning derivative claims asserted by any shareholder(s) on behalf of nominal defendant Ibis, or in any separate action included herein, shall bear the following caption:

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re IBIS TECHNOLOGY CORP.
DERIVATIVE LITIGATION

This Document Relates to:

ALL ACTIONS

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) Civil Action No. 04-10341 (RCL)
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c. The Court hereby appoints William B. Federman of the law firm of Federman & Sherwood as Lead Counsel and Alan L. Kovacs of the Law Offices of Alan L. Kovacs as Liaison Counsel for the Plaintiff in the Derivative Action. Lead and Liaison Counsel shall coordinate and direct on behalf of all plaintiffs: (i) all pre-trial discovery; (ii) briefing and argument of motions; (iii) meetings of plaintiffs' counsel for purposes of proposing joint actions as deemed necessary; (iv) conducting expert discovery; (v) the preparation for and trial of the Derivative Action; and (vi) any and all settlement negotiations with Defendants. Defendants' counsel may rely upon all agreements made with plaintiffs' Lead Counsel and Liaison Counsel, or other duly authorized representative of plaintiffs' Lead Counsel and Liaison Counsel, and such agreements shall be binding on plaintiffs.

6. Defendants and nominal Defendant Ibis do not oppose this motion, except that Defendants and Ibis take no position with respect to Lead Counsel.

Plaintiff therefore respectfully requests that the Court enter the [Proposed] Order to Administratively Consolidate Actions filed herewith.

Dated: March 31, 2004

Respectfully submitted,

LOUIS F. MATHESON JR., Derivatively On
Behalf of Nominal Defendant, IBIS
TECHNOLOGY CORP.

By his attorneys,

Alan L. Kovacs /OK

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CERTIFICATE OF SERVICE
I hereby certify that a true copy of the above document was
served upon the attorney of record for each other party
(by mail (forward) on 3/31/04
Laura M. Stock

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